

AND NOW come the Plaintiffs, Freedom From Religion Foundation, Inc. (“FFRF”), Doe 4, and Doe 5, by and through their attorneys, Marcus B. Schneider, Esquire and STEELE SCHNEIDER, and the Defendant, Connellsville Area School District, by and through its attorneys, John W. Smart, Esquire, Amie A. Thompson, Esquire, and ANDREWS & PRICE, and file the within Joint Motion for Protective Order and in support thereof aver as follows:

1. Plaintiffs filed a Motion for Leave to Proceed Using Pseudonyms contemporaneously with the filing of this Joint Motion for Protective Order.
2. In the event that the Court grants Plaintiff's Motion for Leave to Proceed Using Pseudonyms, the Plaintiffs and Defendant have agreed upon the terms of a Protective Order that establishes procedure and protocol covering the production of any and all potentially identifying information by Plaintiffs and for the handling of any and all produced identifying information by Defendant.

3. Specifically, the parties have agreed to operate under the same essential terms as the Protective Order as this Honorable Court ordered in the case of *Freedom From Religion Foundation, et al v. New Kensington-Arnold School District*, 2:12-cv-01319, Document No. 26 (March 28, 2013).
4. The Joint Proposed Protective Order filed with this Motion contains those same terms.

WHEREFORE, Plaintiffs and Defendant respectfully request this Honorable Court grant their Joint Motion for Protective Order and adopt the Proposed Protective Order.

Respectfully submitted,

/s/ Marcus B. Schneider, Esquire
Marcus B. Schneider, Esquire
PA I.D. No. 208421
STEELE SCHNEIDER
428 Forbes Avenue, Suite 900
Pittsburgh, PA 15219
(412) 235-7682
(412) 235-7693/facsimile
mschneider@steleschneider.com
Counsel for Plaintiffs

/s/ John W. Smart, Esquire
John W. Smart, Esquire
PA I.D. No. 43592
Amie Thompson, Esquire
PA I.D. No. 309345
ANDREWS AND PRICE
1500 Ardmore Blvd., Suite 506
Pittsburgh, PA 15221
(412) 243-9700
(412) 243-9660/facsimile
jsmart@andrewsandprice.com
athompson@andrewsandprice.com

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2013, the foregoing **JOINT MOTION FOR PROTECTIVE ORDER** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic case filing system and constitutes service of this filing under Rule 5(b)(2)(E) of the Federal Rules of Civil Procedure. Parties may access this filing through the Court's ECF system.

/s/ Marcus B. Schneider, Esquire
Marcus B. Schneider, Esquire